

EXHIBIT 4

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND)
COMPOUNDING PHARMACY, INC.) MDL No. 2419
PRODUCTS LIABILITY LITIGATION) Dkt. No. 1:13-md-2419-RWZ
_____)

This Document Relates to:)
)
Suits Naming Specialty Surgery Center,)
PLLC)
_____)

Supplemental Affidavit of Jean Atkinson, RN

STATE OF TENNESSEE
COUNTY OF DAVIDSON

Jean Atkinson, RN, after first being duly sworn, states as follows:

1. I am over 18 years of age, have personal knowledge of the facts contained herein, and I am competent to testify. I was the Director of Nursing at SSC in 2012 and in 2013 until mid-April.
2. I exchanged confidential attorney-client communications with attorneys with Gideon, Cooper and Essary using my SSC email account prior to the sale of SSC's assets in June 2013.
3. SSC's computers were desktop computers. Accessing the computers required a login and password.
4. I was assigned my own computer to use at SSC. I only accessed my SSC email account from my individual computer. The computer was password protected. I believe the same was true for the other SSC staff members who had email accounts at SSC, including Kim Bowlin. They had an individual computer that was password protected, which they used to access their email account.
5. Each staff member at SSC was assigned an individual login and password necessary to access the computers at SSC. The physicians at SSC had a single login and password they used to access the computers. Generally, the physicians used the computers less frequently than the staff.

6. In addition to using my login and password to access my individual computer, I used my login and password to access various "shared" computers throughout the facility.
7. I was hired to work at Cumberland Medical Center's ("CMC") inpatient hospital in September 2013. When I started at the hospital, I was issued a new login and password used to access CMC's computer system.
8. In May 2014, CMC reopened SSC's facility as an outpatient endoscopy center. I transferred from the CMC inpatient hospital to the endoscopy center in May 2014 and began working as a staff Registered Nurse. I left that position in May 2015.
9. I continued to use the CMC login and password issued to me at the hospital to access the computers at the outpatient endoscopy center. The computers I used at the center were all laptop computers. Logging in to the laptops allowed me to access CMC's medical records software, which was linked to the hospital's medical records system. This was a different medical records system than that used by SSC while it was in operation.

Jean Atkinson

Sworn to and subscribed by me on this 21st day of June, 2016.

L. DeB

(Notary Public)

My Commission Expires: 07/03/17

